RCRA Subtitle I Inspection Report

UST Compliance Inspection

Easton Point
930 Port Street
Easton, MD 21601

Telephone Number: (410) 310-3553

Date of Inspection: June 13, 2018

Facility Identification Number: 1656

EPA Representative: Melissa Toffel

Facility Representatives & Contacts: Tim Miller, Owner & Operator

Tank/Property Owner: 930 Port Street, Inc. dba Commercial Fuel Systems, Inc.
Contact: Tim Miller
Email: tmiller@nationalpremiumbeer.com
P: (410) 310-3553

Melissa Toffel
Melissa Toffel

6/21/18
Date

Background

On June 13, 2018, the United States Environmental Protection Agency (EPA) Region III, Office of Land Enforcement, represented by Melissa Toffel, conducted a Compliance Evaluation Inspection (CEI) of the Easton Point facility located at 930 Port Street in Easton, Maryland, to determine the extent of compliance with Subtitle I of the Resource Conservation and Recovery Act (RCRA).

Inspection Observations

Inspection Procedures. Melissa Toffel contacted the owner, Tim Miller, one week prior to the inspection to ensure that a representative would be present for the inspection. Ms. Toffel spoke to Mr. Miller, and was told that he would be there to assist. Thus, the inspection proceeded on June 13, 2018. Upon arrival at the facility, credentials were presented to Mr. Miller, and the scope and purpose of the inspection were explained. Mr. Miller was there to assist with the opening of lids/covers and to help answer questions and provide records that were requested. After completing the inspection, Melissa Toffel completed the Region III Underground Storage Tank (UST) Compliance Checklist, which is included as **Attachment 1** to this report.

Tank Descriptions. Easton Point has four (4) USTs (one of which is compartmentalized) which are being used to store regulated substances, all of which are petroleum-based products (see **Table 1**). According to information provided by the Maryland Department of the Environment (MDE), and observations made on-site, all the USTs are constructed of single-walled cathodically-protected steel with single-walled fiberglass-reinforced plastic piping. Three (3) of the USTs were installed in January 1994, and one (1) was installed in January 1995 (see **Attachment 2**).

Table 1.
UST & Piping Details for Easton Point

Tank #	Material Stored	Capacity (gal.)	Installation Date	Tank Construction Material	Piping Construction Material
1*	93 Octane (prem ethanol)	4,000	1/94	SW** Cathodically-protected steel	SW FRP***
2	Off-road diesel	4,000	1/94	SW Cathodically-protected steel	SW FRP
3	On-road diesel	8,000	1/94	SW Cathodically-protected steel	SW FRP
4	91 Octane (prem non-ethanol)	8,000	1/94	SW Cathodically-protected steel	SW FRP
5	87 Octane (regular)	8,000	1/95	SW Cathodically-protected steel	SW FRP

* Tanks 1 and 2 are compartments of one large 8,000g tank
** SW = single-walled
*** FRP = fiberglass-reinforced plastic

Tank Release Detection. Releases from the tanks are monitored by a Veeder-Root TLS-350 Plus system that conducts Automatic Tank Gauging (ATG). Specifically, the Veeder-Root is running .2gph testing on the USTs as the primary method of tank release detection. Alarms appear on the

ATG monitor, and at the time of inspection "T2: LOW PRODUCT ALARM" and "T2: DELIVERY NEEDED" was displayed.

When asked for the last 12 months of tank release detection records, Mr. Miller was only able provide records for the months of May and June 2018 (see **Attachment 3**). For May 2018, a test could not be conducted on Tank 3 due to a low level of product, but the rest of the tanks received passing results. In June 2018, Tanks 1 and 5 passed testing, but Tanks 2, 3, and 4 could not pass testing due to low product.

Current Tank Setup reports, and other additional information, was pulled from the Veeder-Root at the time of the inspection (see **Attachment 3**). An Alarm History Report showed recent paper and printer alarms. The facility also provided a recent Tank Monitoring System Certification from Clean Fuels, dated 3/23/18 (see **Attachment 4**).

Piping Release Detection. The piping for all of the USTs is pressurized, as verified from information provided by MDE, as well as what was viewed on-site during the inspection. Mechanical Line Leak Detectors (LLDs) were viewed in the sumps for all the tanks. When asked for the most recent documentation of LLD functionality testing, Mr. Miller provided paperwork to show that all the LLDs had been tested on 3/23/18, and all five (5) passed. A test dated 6/27/16 was provided also, and showed that three (3) LLDs were tested at that time (T2 Pass, T4 Pass, T5 Fail) but two (2) could not be. Notes on the paperwork show that Tank 1 and Tank 3 had "issues with pulling fuel." **(See Attachment 4)**

For secondary piping release detection, the facility is having Line Tightness Testing (LTT) performed. LTT records were provided dated 3/23/18, and showed that all passed. LTT dated 6/27/16 was also provided and showed that Tanks 2, 4, and 5 passed, but Tanks 1 and 3 were not tested at that time. **(See Attachment 4)**

All the piping at the facility is single-walled so sump sensors are not in use.

Spill/Overfill. All the tanks are equipped with spill buckets. A small amount of liquid was seen in the spill bucket for Tank 4. Cutoff valves did not appear to be installed for any of the tanks, and no audible/visual alarm is in place for overfill prevention. When asked what method of overfill protection is used, Mr. Miller stated they may have ball floats, but this could not be verified during the inspection.

Cathodic Protection. An Impressed Current System is being utilized for cathodic protection (CP) of the tanks. Mr. Miller was asked to provide documentation of the last two (2) tests of the CP system. Documentation of testing of the flex connectors was provided, dated 3/8/18, all passing. CP testing records from 2/1/18 were also provided, for all the tanks, and showed all passing results. Documentation was also provided for testing of the flex connectors and the tanks on 6/17/16, and all showed passing results. **(See attachment 5)** Readings of the rectifier are being recorded monthly, and the most recent readings for 2018 was observed.

Financial Responsibility. The facility maintains release coverage through a policy provided by Colony Insurance Company. The current active policy was provided showing dates of coverage to be 9/20/17 to 9/20/18. The schedule attached noted all of the USTs. **(See Attachment 6)**

Attachments

1. Region III UST Compliance Checklist
2. MDE UST Registration Information
3. Veeder-Root Printouts
4. LLD/LTT Records
5. Cathodic Protection Testing
6. Financial Responsibility
7. Photo Log